UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS WESTERN DIVISION

NOTICE OF MOTION

TO:

JAMIE A. HAFFERTY, 236 Bolen Rd, Pecatonica, IL 61063 LYDIA MEYER, Chapter 13 Trustee, P.O. Box 14127, Rockford IL 61105

PLEASE TAKE NOTICE that on <u>March 19, 2010</u> at the hour of <u>9:00 a.m.</u>, or as soon thereafter as counsel may be heard, I shall appear before the Honorable <u>Judge Manuel Barbosa</u>, Bankruptcy Judge, in the Courtroom usually occupied by him at the Federal Courthouse, 211 S. Court Street, Rockford, Illinois, or before any other Bankruptcy Judge who may be sitting in his place and stead, and shall then and there present the attached:

MOTION TO WITHDRAW

a copy of which is attached hereto and is herewith served upon you, and shall pray for the entry of an Order in compliance therewith, at which time you may appear if you so desire.

DATED: March 9, 2010 /s/ DONALD P. SULLIVAN

DONALD P. SULLIVAN (#6196673) Attorney for debtor 126 N. Church St. Rockford IL 61101 815 968-5205

CERTIFICATE OF MAILING

The undersigned, an attorney, hereby certifies that he served a copy of this Notice upon the following:

JAMIE A. HAFFERTY, 236 Bolen Rd, Pecatonica, IL 61063 LYDIA MEYER, Chapter 13 Trustee, P.O. Box 14127, Rockford IL 61105

by placing a true and correct copy of said document(s) in an envelope(s); he sealed said envelope(s) and placed sufficient United States postage on same; that he deposited said envelope(s) so sealed and stamped in the United States Mail at Rockford, Illinois at or about the hour of 5:00 p.m. on the 9th day of March, 2010.

/S/ DONALD P. SULLIVAN

UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF ILLINOIS WESTERN DIVISION

In re:)		
JAMIE HAFFERTY)	NO.	10-70034
	Debtor.)		

MOTION FOR LEAVE TO WITHDRAW

NOW COMES the attorney, DONALD P. SULLIVAN, and for his Motion For Leave to Withdraw, states:

- 1. Irreconcilable differences exist between DONALD P. SULLIVAN and the debtor, JAMIE HAFFERTY. Debtor has stated that he wishes to retain other counsel.
- 2. The debtor and the attorney mutually wish to terminate the attorney-client relationship.
- 3. The attorney cannot effectively represent the interests of the client.

WHEREFORE, by reason of the foregoing, the attorney prays that the Court grant leave for him to withdraw as counsel for JAMIE HAFFERTY.

/s/ DONALD P. SULLIVAN, Attorney for debtor

DONALD P. SULLIVAN (#6196673) Attorney for JAMIE HAFFERTY 126 N. Church St. Rockford IL 61101 815 968-5205